



TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
JACKSON ENVIRONMENTAL FIELD OFFICE
1625 HOLLYWOOD DRIVE
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CERTIFIED MAIL: 7008 1830 002 2505 3080

September 12, 2014

Bill Timbes, Owner
B. T. Redi-Mix, Inc.
1800 Boyd Avenue
P.O. Box 662
Brownsville, Tennessee 38012

REF: Letter of Advisement
Permit No.'s: TNG110375- Stanton Facility (Haywood Co.)

Dear Mr. Timbes,

On Tuesday, September 9, 2014, I visited the community of Stanton in reponse to an anonymous complaint from a residence near your facility. I found that the facility was now active. I inquired of your Plant Manager, Richard Farris as to how long the Stanton facility had been in operation. Mr. Farris informed me that you had operated the plant off and on for approximately two years and since the Mega Site/ Welcome Center project had begun, the plant has run continuously. I then requested a copy of the Stormwater Pollution Prevention Plan (SWPPP) for the facility but Mr. Farris admitted that he was not familiar with a SWPPP.

An inspection of the premises revealed two active process discharge points. When I returned to the office I checked the Discharge Monitoring Report (DMR) on file in the Jackson Environmental Field Office for your Stanton Plant and found "NO DISCHARGED" marked on each form dating back to February, 2010, including the annual stormwater DMR's.

Based on these findings, your next DMR for BT Redi-Mix, Inc.'s Stanton facility should reflect process water analytical results and the same for stormwater flow (based on the heavy rains in Haywood County the morning of Thursday, September 11, 2014). Please allow me to remind you of the certification statement at the bottom of each DMR. It reads as follows:

I certify under penalty of law that this document and all attachments are prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of time and imprisonment for having violations.

An additional observation made while reviewing your DMR's is that Ronnie Blaylock has been the historical signator. For Mr. Blaylock to be authorized to sign any of the DMR's, the Division of Water Resources must have written documentation conveying that authority to the specific individual. A review of the file for this site finds this documentation lacking. This applies to the DMR's for all BT Redi-Mix plants.

ACTION ITEMS:

1. Make the needed arrangements to complete the required sampling.
2. Up-date the SWPPP for the Stanton facility and implement it. It is strongly recommended that one be available at each plant.
3. Since Mr. Farris was not familiar with a SWPPP, it appears that the required "Annual Training" needs to commence.
4. If you choose not to sign the DMR's, you will need to submit a letter delegating that responsibility to the individual or individuals you want to sign the DMR's.
5. Please respond in writing on or before September 30, 2014, confirming to this office that your process sampling was completed before the end of this quarter (Tuesday, 09.30.2014) and committing to obtaining your annual stormwater sample before the end of this sampling year that ends on December 31, 2014. You are allowed to sample stormwater any time from January 1 through December 31st of each year and report the results on the appropriate DMR.

I look forward to your positive response and getting your Stanton Plant into full compliance with its RMCP permit. If you have any questions concerning this letter or any other issue that you think I might be able to assist you with, feel free to call me at 731.512.1362 or by email at James.W.Scott@tn.gov.

Sincerely,



James W. Scott
Jackson Environmental Field Office
1625 Hollywood Drive
Jackson, Tennessee 38305

CC DiAne Gordon, ECT
751 East Brookhaven Circle
Memphis, Tennessee 38117

Conner Franklin, Manager
Ward Pritchard, Program Coordinator